

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROBERT BROWN and THE ESTATE OF BOBBI	)	
KRISTINA BROWN	)	
Plaintiffs	)	Action No.
v.	)	18-CV-11078-CM
	)	
SHOWTIME NETWORKS, INC.,	)	
BRITISH BROADCASTING CORPORATION,	)	
PASSION PICTURES CORP, TRACEY BAKER-	)	
SIMMONS, WANDA SHELLEY, B2	)	
SHOWTIME NETWORKS, INC.	)	
ENTERTAINMENT LLC and SIMMONS SHELLEY	)	
ENTERTAINMENT, LLC	)	
Defendants	)	

**AFFIRMATION OF CHRISTOPHER BROWN**

I, Christopher Brown (“Brown”) state under the pains and penalty of perjury:

1. I am member of the Law firm Brown & Rosen LLC.
2. I was counsel in the *Brown v. Tv One LLC*, 1:17-cv-06824-AT litigation. A confidential settlement was reached in the action.
3. Annexed as Exhibit “A” is an initial credit scene which appeared in the TV One LLC movie “Bobbi Kristina” which indicated the characters has been “invented” and events “fictionalized” in the alleged biography of Bobbi Kristina. The movie aired after the preliminary injunction hearing in *Brown v. Tv One LLC*, 1:17-cv-06824-AT. TV One LLC did not provide the Court with a copy of the Bobbi Kristina movie in the litigation for the Court to evaluate the claims that the film was in fact a biography.
4. Annexed as Exhibit “B” *Davis v. Electronic Arts*, No. 12-15737 (9<sup>th</sup> Cir. Court of Appeals, Decided January 6, 2015).
5. Annexed as Exhibit “C” *Byrne v. BBC*, No. 00-CIV-3141 (SHS) (SDNY); 132 F.Supp.2d 229 (2001);

6. Annexed as Exhibit “D” *Gross v. BBC*, 386 F.3d 224 (2<sup>nd</sup> Cir. 2004)

Signed Under The Pains and Penalty of Perjury

A handwritten signature in black ink, appearing to read "C. Brown", is written over a light blue rectangular background.

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Christopher Brown

Dated: May 2, 2019

# EXHIBIT A

TV  
14  
DL

**While this picture is based on true events,  
some characters have been composited or invented,  
and a number of incidents fictionalized.**

# EXHIBIT B

Annexed as Exhibit “B” *Davis v. Electronic Arts*, No. 12-15737 (9<sup>th</sup> Cir. Court of Appeals, Decided January 6, 2015). Filed separately.

# EXHIBIT C

Annexed as Exhibit “C” *Byrne v. BBC*, No. 00-CIV-3141 (SHS) (SDNY); 132 F.Supp.2d 229 (2001). Filed separately.

# EXHIBIT D

Annexed as Exhibit “D” *Gross v. BBC*, 386 F.3d 224 (2<sup>nd</sup> Cir. 2004). Filed separately.